

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

ROWAN FOWLER, *et al.*,

Plaintiffs,

v.

KEVIN STITT, *et al.*

Defendants.

No. 22-CV-00115-GKF-SH

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFFS' COMPLAINT AND PLAINTIFF C.R.'S MOTION TO
PROCEED PSEUDONYMOUSLY**

Defendants respectfully request an extension of time to file their responsive pleading to the Complaint for Declaratory and Injunctive Relief [Doc. 2] and response to Plaintiff C.R.'s Motion to Proceed Pseudonymously [Doc. 4]. Defendants submit the following in support:

1. On March 14, 2022, Plaintiffs filed and initiated the above-styled suit against Defendants. [*See* Doc. 2].
2. On that same day, Plaintiff C.R. filed a Motion to Proceed Pseudonymously. [Doc. 4].
3. Defendants' responsive pleading is due May 5, 2022, pursuant to Fed. R. Civ. P. 12(a).
4. After the filing of the Complaint, a bill amending a statute mentioned in this suit, OKLA. STAT. tit. 63, § 1-321, was signed into law.
5. On May 4, 2022, counsel for the parties held a telephone conference, wherein Plaintiffs' counsel expressed that they likely intend to amend the Complaint in light of the Legislature's amendment to Section 1-321.
6. In light of Plaintiffs' likely intent to amend the Complaint, granting Defendants an extension of time to respond to Plaintiffs' filings would further the interests of judicial economy.
7. Indeed, an extension of time will provide mutual benefit to the Parties by reducing duplicitous and unnecessary filings and providing Plaintiffs additional time to consider their amended pleading.

8. This is Defendants' first request for an extension and is made in good faith and not for the purpose of unnecessary delay.

9. Counsel for Plaintiffs has indicated to Defendants that Plaintiffs do not object to the relief requested in this Motion.

10. For these reasons, Defendants respectfully request this Court grant them an extension of time to file their responsive pleading to the Complaint for Declaratory and Injunctive Relief [Doc. 2] and response to Plaintiff C.R.'s Motion to Proceed Pseudonymously [Doc. 4] until twenty-one (21) days after the filing of an amended Complaint.

Respectfully submitted,

s/ Audrey A. Weaver

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2022, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of Notice of Electronic Filing to all ECF registrants.

s/ Audrey A. Weaver

AUDREY A. WEAVER

Assistant Solicitor General